



Annual Performance Report Form

Facility Name: Montenay Energy Resources of Montgomery County, Inc.

Performance Track ID #: A03-0013

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: July 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 ☒ Name of your facility: Montenay Energy Resources of Montgomery County, Inc.
- A.2 ☐ Name of your parent company: Montenay Power Corporation
- A.3 ☐ Facility contact person for the Performance Track program
Name: Mr./Mrs./Ms./Dr. Mr. Tom Murphy, Facility Manager (tmurphy@montenayenergy.com)
Title: and / or Mr. John Sammons, EHS Manager (jsammons@montenayenergy.com)
Phone: 610 - 940 - 6000 Fax: 610 - 940 - 6012 E-mail: as above
- A.4 ☐ Facility's location
Street Address: 1155 Conshohocken Road
Street Address (cont.):
City/State/Zip Code: Conshohocken, Pennsylvania 19428
- A.5 ☐ Facility's website address (if any): montenayenergy.com
- A.6 ☐ Number of employees (full-time equivalents) who currently work in the facility:
☒ Fewer than 50 ☐ 50 - 99 ☐ 100 - 499 ☐ 500 - 1000 ☐ More than 1000
- A.7 ☐ Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No
- A.8 ☐ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 562213
- A.9 ☐ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☐ Yes ☒ No
- A.10 ☐ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
No changes

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

- | |
|--|
| <p>a. Was an EMS audit or other assessment done by an independent third party? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please provide the <i>type</i> (e.g., ISO 14001 certification), the <i>scope</i>, and the <i>dates</i> (mo/yr) of each assessment.</p> |
| <p>b. Was an internal or corporate EMS audit conducted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please provide the <i>scope</i> and the <i>dates</i> (mo/yr) of each audit. Between the time of the first annual report submission and this revised report, a bi-annual internal audit was performed. Date of the audit was on August 6th and 7th, 2002. This audit found all elements of the facility EMS in conformance with ISO 14001 standards and there were no non-conformances issued.</p> |
| <p>c. Was a compliance audit conducted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please provide the <i>scope</i> and the <i>dates</i> (mo/yr) of each audit, and indicate <i>who</i> conducted the audit(s) (e.g., facility staff, corporate groups, third party). A scheduled internal compliance audit (completed every two years was conducted in August of 2000. Our next internal audit will be performed in August 2002.</p> |
| <p>d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here. Both above described audits concluded continued registration of the facility EMS system with zero non-conformances.</p> |

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

The facility has realized positive results by enhancing our EMS training format and curriculum. Employees beyond the scope of the facility EMS "Working Group" (the ISO 14001 program custodians) are involved in monitoring environmentally related job tasks.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☐ Yes ☐ No ☒ No such instances identified

If no, please explain your plans to correct these instances. N/A

g. When was the last Senior Management review of your EMS completed? *mo/yr* October 2000

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr. Jay Lehr

Title: Facility Manager

Note: A two-year internal audit and subsequent management review is scheduled for August 2002.

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? ☒ Yes ☐ No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* November 2001

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the *reporting year*.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

| <i>Environmental Aspect</i> | <i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted) |
|---|--|
| Boiler / Furnace grate bar recycling | See Section "C" for progress |
| Cardboard recycling | See Section "C" for progress |
| Fuel oil storage tank emissions reduction | See Section "C" for progress |
| Wastewater re-use for facility cooling water system | See Section "C" for progress |
| | |
| | |

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): Materials Use

Aspect (see page 16 of the instructions): Recycled / Re-Used Materials Use. Boiler / Furnace Grate Bars

| | <i>Baseline</i> (as stated in your application) | <i>Year 1</i> | <i>Year 2</i> | <i>Year 3</i> | <i>Performance Commitment</i> (the goal stated in your application) |
|---|---|---------------|---------------|---------------|--|
| <i>Calendar Year</i> | 2000 | 2001 | | | 2003 |
| <i>Actual Quantity</i> (per year) | 45,000 | 45,000 | | | (optional) |
| <i>Measurement Units</i> | U.S. Pounds | | | | |
| <i>Normalizing Factor*</i> | 1.0 | 1.0 | | | (optional) |
| <i>Basis for your Normalizing Factor*</i> | Average number of grate bar replacements per calendar year is 1,000. This number is not influenced by increased or decreased facility production throughput. The baseline number is revised to reflect actual weight of each bar. | | | | |
| <i>Normalized Quantity*</i> (per year) | 45,000 | 45,000 | | | 135,000 |

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Between the time of original application and the submittal of the initial annual report, grate bar weight was revised from 70 lbs. each to 45 lbs. each. Additionally, Eagle Foundry and Montenay Energy Resources have entered into contract to recycle / purchase grate bars. Montenay sends Eagle Foundry the grate bars, Eagle recycles them into new bars and Montenay buys the new grate bars from Eagle.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.2

Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

| | | | | | |
|--|---|---------------|---------------|---------------|---|
| Category (see page 16 of the instructions): Waste | | | | | |
| Aspect (see page 16 of the instructions): Total Solid Waste (Recycling) | | | | | |
| | <i>Baseline (as stated in your application)</i> | <i>Year 1</i> | <i>Year 2</i> | <i>Year 3</i> | <i>Performance Commitment (the goal stated in your application)</i> |
| <i>Calendar Year</i> | 2000 | 2001 | | | 2003 |
| <i>Actual Quantity (per year)</i> | 2,000 | 1,800 | | | 6,000 (optional) |
| <i>Measurement Units</i> | U.S. Pounds | | | | |
| <i>Normalizing Factor*</i> | 1.0 | 1.0 | | | (optional) |
| <i>Basis for your Normalizing Factor*</i> | Subsequent to application submittal (original was for community participation) we revised this commitment to include only cardboard generated on-site. The commitment goal remains the same relevant to total pounds. | | | | |
| <i>Normalized Quantity* (per year)</i> | 2,000 | 1,800 | | | 6,000 |
| *See pages 17-19 of the instructions for more information | | | | | |

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Community involvement in cardboard recycling was minimal in 2001 so we revised the process to retain the aspect category by measuring and shipping cardboard generated within the facility. Employees have reviewed this category to form a concerted effort in doing so.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.3 Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

| | | | | | |
|--|---|---------------|---------------|---------------|--|
| Category (see page 16 of the instructions): Air Emissions | | | | | |
| Aspect (see page 16 of the instructions): Emissions of VOC's: Fuel Oil Storage Tank Emissions Reduction | | | | | |
| | <i>Baseline</i> (as stated in your application) | <i>Year 1</i> | <i>Year 2</i> | <i>Year 3</i> | <i>Performance Commitment</i> (the goal stated in your application) |
| <i>Calendar Year</i> | 2000 | 2001 | | | 2003 |
| <i>Actual Quantity</i> (per year) | 393 | 0 | | | (optional) |
| <i>Measurement Units</i> | U.S. Pounds: Volatile Organic Compounds | | | | |
| <i>Normalizing Factor*</i> | 1.0 | 1.0 | | | (optional) |
| <i>Basis for your Normalizing Factor*</i> | Annual consumption of supplemental #2 fuel oil for furnace ignition and supplemental furnace temperatures; not influenced by annual throughput of MSW or number of boiler shutdown periods. | | | | |
| <i>Normalized Quantity*</i> (per year) | 393 | 0 | | | 196.5 |
| *See pages 17-19 of the instructions for more information | | | | | |

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Upon initial assessment we discovered the floating lid in the tank is submerged. Plans have been made to refloat the lid and an engineering consultant is reconfiguring calculations for the amount of VOC reduction gained from the tank lid repairs. Due to the tank lid being submerged, VOC's emitted does not change. The normalizing factor is 1.0 because the fuel consumption for years 2000 and 2001 are relatively the same.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.4

Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): Water Use

Aspect (see page 16 of the instructions): Total Water Use (amount of reduction in domestic water purchased by recycling boiler quality water to the cooling tower)

| | <i>Baseline (as stated in your application)</i> | <i>Year 1</i> | <i>Year 2</i> | <i>Year 3</i> | <i>Performance Commitment (the goal stated in your application)</i> |
|---|---|---------------|---------------|---------------|---|
| <i>Calendar Year</i> | 2000 | 2001 | | | 2003 |
| <i>Actual Quantity (per year)</i> | 66,666 | 85,000 | | | (optional) |
| <i>Measurement Units</i> | U.S. Gallons | | | | |
| <i>Normalizing Factor*</i> | 1.0 | 1.0 | | | (optional) |
| <i>Basis for your Normalizing Factor*</i> | none | | | | |
| <i>Normalized Quantity* (per year)</i> | 66,666 | 85,000 | | | 200,000 |

*See pages 15-17 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Appropriate methods and operating procedures have been fully implemented to transfer high purity water from the boiler drains to the cooling water tower basin enabling us to supplement the tower make-up system. While this process recycles water, it additionally reduces the amount of raw water required to maintain proper levels and further reduces chemical additives needed to support cooling tower water quality.

This category has been revised to reflect all measurements in gallons. (1st revision was in pounds)

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section D

Public Outreach and Performance Reporting

D.1

Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

- 1) Facility tours and presentations were conducted for various local and regional groups of community leaders, concerned citizens and educational consortiums including high schools, colleges and special interest associations (including government entities, law enforcement, postal service and the Occupational Health and Safety Administration).
- 2) The facility EMS (Environmental Management System) performance is regularly communicated to Corporate Management.
- 3) The facility maintains a website (montenayenergy.com) that offers EHS related information that is updated 1-2 times annually.
- 4) The facility is in the process of developing a "virtual tour" on the company website for community educational outreach efforts.
- 5) Our performance evaluations toward goals (in the Performance Track Program) will be summarized and available on our webpage.

D.2

Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

- ☒ Website (URL montenayenergy.com)
- ☐ Open House
- ☐ Meetings
- ☐ Press Releases
- ☐ Community Advisory Panel
- ☐ Other

Section E

Self-Certification of Continued Program Participation

On behalf of Montenay Energy Resources of Montgomery County, Inc.,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date On hardcopy (to be forwarded) December 16, 2002

Printed Name Mr./Mrs./Ms./Dr. Mr. Tom Murphy

Title Facility Manager

Phone Number/E-mail Address 610 - 940 - 6000 ext. 102 tmurphy@montenayenergy.com

Facility Name Montenay Energy Resources of Montgomery County, Inc.

Facility Street Address 1155 Conshohocken Road Conshohocken, Pennsylvania 19428

Performance Track Identification Number A03-0013

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

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